

1 **KENT R. ROBISON, ESQ. - NSB # 1167**

krobison@rbsllaw.com

2 **KRISTEN L. MARTINI, ESQ. - NSB # 11272**

kmartini@rbsllaw.com

3 **Robison, Belaustegui, Sharp & Low**

A Professional Corporation

4 71 Washington Street

Reno, Nevada 89503

5 Telephone: (775) 329-3151

Facsimile: (775) 329-7169

7 **LAWRENCE A. JACOBSON, ESQ. (admitted *pro hac vice*)**

laj@cohenandjacobson.com

8 **SEAN M. JACOBSON, ESQ. (admitted *pro hac vice*)**

sean@cohenandjacobson.com

9 Cohen and Jacobson, LLP

900 Veterans Boulevard, Suite 600

10 Redwood City, CA 94063

Telephone: (650) 261-6280

11 Facsimile: (650) 368-6221

12 Attorneys for Plaintiffs /Counterdefendants

Infinite Financial Solutions, Inc.,

13 Silver Eagle Labs, Inc., NicoSpan, Inc.

Michele Lockwood and Hanford Lockwood

15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 \* \* \* \* \*

18 INFINITE FINANCIAL SOLUTIONS,  
INC., a Nevada Corporation; SILVER  
EAGLE LABS, INC., a Nevada  
19 Corporation; and NICOSPAN, INC, a  
Nevada Corporation,

20 Plaintiffs,

21 STRUKMYER, LLC, a Texas Limited  
Liability Company; SILVER EAGLE  
22 LABS NV, LLC, a Nevada Limited  
Liability Company; SILVER EAGLE  
23 LABS, LLC, a Texas Limited Liability  
Company; ROBERT DELK, an individual;  
24 and DOES 1-50, inclusive,

25 Defendants.

26 \_\_\_\_\_/  
27 STRUKMYER, LLC,

28 Counterclaimant,

CASE NO.: 3:13-cv-00466-HDM-WGC

**JOINT MOTION AND STIPULATION  
FOR EXTENSION OF TIME FOR  
PARTIES TO FILE A JOINT  
DISCOVERY PLAN AND  
SCHEDULING ORDER PURSUANT TO  
COURT ORDER (DOC. 59) AND  
ORDER THEREON**

**(First Request)**

1 vs.

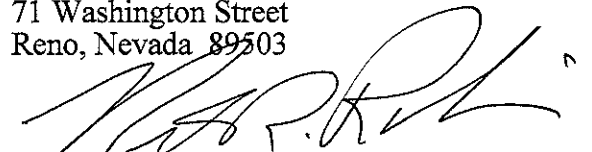
2 INFINITE FINANCIAL SOLUTIONS,  
3 INC.; SILVER EAGLE LABS, INC.;  
4 MICHELE LOCKWOOD; and  
HANFORD LOCKWOOD,

5 Counterdefendants.  
6 \_\_\_\_\_/

7 The parties, through their undersigned counsel, do hereby request an additional two (2)  
8 weeks, to and including January 29, 2014, in which to file their Joint Discovery Plan and  
9 Scheduling Order in compliance with L.R. 26-1 as ordered by this Court in its Minutes  
10 (Doc. 59) due to the complexities of this case. This action now involves two lawsuits. The case  
11 transferred to this district from the District of Texas, now considered a Counterclaim, and the  
12 allegations in the Plaintiffs' Complaint both involve complicated trademark and patent issues, as  
13 well as other complicated commercial transactions. The parties believe that patent rules require  
14 additional scheduling deadlines and other procedural requirements. The parties, therefore, need  
15 additional time in which to draft and submit their proposed Discovery Plan and Scheduling  
16 Order.

17 DATED this 15<sup>th</sup> day of January, 2014.

18 ROBISON, BELAUSTEGUI, SHARP & LOW  
19 A Professional Corporation  
71 Washington Street  
20 Reno, Nevada 89503




21 KENT R. ROBISON - NSB #1167  
22 KRISTEN L. MARTINI - NSB #11272  
Attorneys for Plaintiffs

23 LAWRENCE A. JACOBSON, ESQ.  
24 SEAN M. JACOBSON, ESQ.  
COHEN AND JACOBSON, LLP  
25 900 Veterans Blvd., Suite 600  
26 Redwood City, California 94063  
Attorneys for Plaintiffs /Counterdefendants  
27 Infinite Financial Solutions, Inc.,  
Silver Eagle Labs, Inc., NicoSpan, Inc.  
Michele Lockwood and Hanford Lockwood

1 DATED this 15<sup>th</sup> day of January, 2014.

2 MCDONALD CARANO WILSON LLP  
3 100 West Liberty Street, 10th Floor  
4 P.O. Box 2670  
5 Reno, Nevada 89505-2670

6   
7 LEIGH T. GODDARD - NSB #6315  
8 MEGAN STARICH - NSB #11284  
9 Attorneys for Defendants/Counterclaimant  
10 Strukmyer, LLC, Silver Eagle Labs NV, LLC,  
11 Silver Eagle Labs, LLC and Robert Delk

12 **ORDER**

13 IT IS SO ORDERED. The parties shall file their Joint Discovery Plan and Scheduling  
14 Order on or before January 29, 2014.

15 DATED this 16th day of January, 2014.

16   
17 UNITED STATES MAGISTRATE JUDGE

18 J:\WPData\Krr\1277.001-Infinite\P-Stip.Order Extension.Jt. Disc.Plan.wpd